

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CYNTHIA HRNYAK, et al.

Plaintiffs,

v.

**MID-WEST NATIONAL LIFE
INSURANCE COMPANY OF
TENNESSEE,**

Defendant.

) **Case No. 1:08CV2642**

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JUDGE JAMES GWIN

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**DEFENDANT'S MOTION FOR PRO
HAC VICE ADMISSION OF ANDREW
G. JUBINSKY.**

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Defendant, Mid-West National Life Insurance Company of Tennessee, by and through its Ohio counsel, Black, McCuskey, Souers & Arbaugh, hereby moves this Court for permission to allow Andrew G. Jubinsky of the law firm of Figari & Davenport, LLP of Dallas, Texas to appear and participate in the above-captioned case for purposes of representing Defendant.

Mr. Jubinsky is a member in good standing of the Bar of the State Bar of Texas, the United States District Courts for the Northern, Southern, Eastern and Western Districts of Texas, and the United States Court of Appeals for the Fifth Circuit. A copy of his Certificate of Good Standing for the United States District Court for the Northern District of Texas is attached hereto as **"Exhibit A."** Moreover, Mr. Jubinsky shall be working with Defendant's Ohio counsel, Black McCuskey, Souers & Arbaugh, throughout the pendency of this matter. Defendant further requests that Mr. Jubinsky be added to the Court's electronic filing system, and to that end provides Mr. Jubinsky's information as follows:

Andrew G. Jubinsky (Texas Bar No. 11043000)
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Mr. Jubinsky's \$100.00 admission fee is being submitted to this Court contemporaneously with the filing of this Motion.

Respectfully submitted,

BLACK, McCUSKEY, SOUERS & ARBAUGH

By: /s/ Gust Callas

Gust Callas (#0015815)

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*Counsel for Defendant, Mid-West National Life
Insurance Company of Tennessee*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served this 9th day of January, 2009, via this Court's electronic filing system upon the following:

Daniel P. Goetz
WEISMAN, KENNEDY & BERRIS CO., L.P.A.
1600 Midland, 101 Prospect Avenue West
Cleveland, Ohio 44115

/s/ Gust Callas
*Counsel for Defendant, Mid-West National Life
Insurance Company of Tennessee*

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